## LAW OFFICES

## GOLDBERG, GODLES, WIENER & WRIGHT LLP

1025 Connecticut Avenue, N.W. WASHINGTON, D.C. 20036

HENRY GOLDBERG JOSEPH A. GODLES JONATHAN L. WIENER DEVENDRA ("DAVE") KUMAR

HENRIETTA WRIGHT THOMAS G. GHERARDI, P.C. COUNSEL

THOMAS S. TYCZ\* SENIOR POLICY ADVISOR \*NOT AN ATTORNEY (202) 429-4900 TELECOPIER: (202) 429-4912 e-mail: general@g2w2.com website: www.g2w2.com

May 10, 2017

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Ex Parte, IB Docket No. 17-95

Dear Ms. Dortch:

On May 8, 2017, Maureen C. McLaughlin, Vice President Public Policy of Iridium Satellite LLC ("Iridium"), Scott Blake Harris of Harris, Wiltshire & Grannis LLP, representing Iridium, and the undersigned, also representing Iridium, met with Rachael Bender of Chairman Pai's office and separately with Erin McGrath of Commissioner O'Rielly's office concerning the above-referenced proceeding.

The tentative agenda for the Commission's meeting on May 18, 2017, includes a Notice of Proposed Rulemaking in which the Commission would, among other things, propose rules that would permit earth stations in motion ("ESIMs") to be licensed in the 11.7-12.2 GHz, 14.0-14.5 GHz, 18.3-18.8 GHz, 19.7-20.2 GHz, 28.35-28.6 GHz, and 29.25-30 GHz bands. During the May 8 meetings, we focused on the problems that would be created by allowing ESIMs to operate in the 29.25-29.3 GHz sub-band, which is shared on a co-primary basis between geostationary orbit fixed-satellite service earth stations and Iridium's non-geostationary orbit mobile-satellite service feeder link earth stations.

Specifically, we addressed the substantial risk that ESIMs in the sub-band will cause harmful interference to Iridium's feeder links, because it will be impossible to know in advance how many ESIMs there will be or where they will be. In light of these issues, the Iridium representatives suggested that the 29.25-29.3 GHz sub-band should be removed from the Commission's ESIMs proposal.

Alternatively, we said that if the Commission is not yet ready to remove the 29.25-29.3 GHz band from this proceeding, it should take no position on the merits of including the sub-band and should simply seek comment as to whether operating ESIMs in the sub-band without causing harmful interference to Iridium's feeder links is technically feasible.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

Attorney for Iridium Satellite LLC

cc: Rachael Bender Erin McGrath